

State of California



Fair Political Practices Commission

P.O. BOX 807 • SACRAMENTO, 95804 • • • 1100 K STREET BUILDING, SACRAMENTO, 95814

Technical Assistance	• •	Administration	• •	Executive/Legal	• •	Enforcement
(916) 322-5662		322-5660		322-5901		322-6441

August 6, 1984

George Hardie
7301 Eastern Avenue
Bell Gardens, CA 90201

Re: Advice Letter No. A-84-199

Dear Mr. Hardie:

The lobbying firm of Priolo and Associates recently asked us for advice concerning whether they were required to report on their lobbying disclosure reports payments received from you for certain services they provided.

Our understanding is that the services they provided to you were in connection with a legislative bill that was vetoed by the Governor. At your request, Priolo and Associates contacted staff members of the Governor's office for the purpose of determining why the legislation was vetoed and what modifications were needed to ensure passage if the legislation were reintroduced.

Our advice to Priolo and Associates is that these activities do constitute "influencing legislative or administrative action," as defined in Government Code Section 82032 and, therefore, they must report the activity and the payments received on their lobbying disclosure reports.

In addition, you have met the definition of a "lobbyist employer" as defined in Government Code Section 86108(a), which provides that the following persons shall file lobbyist employer reports:

Any person who employs or contracts for the services of one or more lobbyists, whether independently or jointly with other persons.

Enclosed is a copy of the Commission's Information Manual on Lobbying Disclosure Provisions of the Political Reform Act along

George Hardie
August 6, 1984
Page Two

with the Form 650 (Report of Lobbyist Employer) which you must file. If you have any questions in connection with filing the report, please contact the Technical Assistance and Analysis Division at (916) 322-5662.

Sincerely,

A handwritten signature in cursive script, appearing to read "Barbara A. Milman".

Barbara A. Milman
General Counsel

BAM:plh
cc: Priolo & Associates